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March 3, 2022

Honorable John K. Sherwood  
United States Bankruptcy Court  
For the District of New Jersey  
50 Walnut Street, 3<sup>rd</sup> Floor  
Newark, NJ 07102

Re: Michael Charles Bessette  
Chapter 13, Case No. 19-13683-JKS

Michael Charles Bessette v. D1 Softball, LLC and Robert Del Vecchio, LLC  
Adv. Pro. No. 22-01026

Dear Judge Sherwood:

Please be advised that this firm has been retained to represent D1 Softball, LLC and Robert Del Vecchio, LLC in connection with the above referenced matters. Please accept this letter for D1 Softball, LLC and Robert Del Vecchio, LLC to join in on Marie-Ann Greenberg, Chapter 13 Standing Trustee's Objection to the Debtor's Application for Retention of DannLaw as Special Counsel ("Debtor's Application").

The Debtor's Application incorrectly states that D1 Softball, LLC and Robert A Del Vecchio, LLC have violated the automatic stay with regard to a Foreclosure Action pending in the Superior Court of New Jersey, Chancery Division, Bergen County, Docket Number F-006279-21 entitled D1 Softball v. Debra Bessette, JPMorgan Chase Bank, N.A. and New Century Financial Services, Inc. (the "Foreclosure Action"). The Debtor, Michael Charles Bessette ("Debtor") is not an owner of the subject real estate located at 416 Cedar Street, Paramus, New Jersey 07652 (the "Property") and is not a party to the Foreclosure Action. In addition, based upon this Court's recent ruling granting Debtor's motion to pay D1 Softball, LLC's secured real estate tax lien through the Debtor's plan, the Foreclosure Action has been placed on administrative hold and, therefore, there is no Foreclosure Action to defend on behalf of the

Debtor.

Accordingly, it is respectfully requested that the Debtor, Michael Charles Bessette's Application for Retention of DannLaw as Special Counsel be denied.

Respectfully submitted,

LAW FIRM OF BRIAN W. HOFMEISTER, LLC  
Attorneys for D1 Softball, LLC and  
Robert Del Vecchio, LLC

By: */s/Brian W. Hofmeister*  
Brian W. Hofmeister

BWH/aw